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1. One of Dr. Burkhauser's recommendations, based on the experience of the Netherlands, is to "experience rate" the payroll tax, requiring employers to shoulder these costs by taxing at higher rates those employers whose employees qualify for DI benefits at above-average rates. What are your thoughts on this idea?

We would need to study this idea more closely to deliver an informed opinion. However, at first glance it sounds like it would increase government red tape and impede employers and entrepreneurs (including USBLN® certified disability owned businesses) ability to expand their businesses and their payroll.

Additionally, it appears that it could be a disincentive with a population that is already struggling to get hired. Our members don't think that any form of "punishment" or tax penalty is wise given how high the unemployment and under-employment rate is for individuals with disabilities.

2. Workers Compensation uses experience rating. What do employers think about experience rating?

We queried our membership and found that they don't work directly with this issue. Thus we would need to work through USBLN® members to get to the right contacts to deliver a response.

3. What are some of the reasons employers give you about why they want to keep individuals with disabilities in the workforce?

USBLN® member companies cite the following reasons for retaining employees with disabilities:

- It's cost effective to recruit and retain the best talent regardless of disability;
- Technologies that are usable by all employees lead to greater productivity by all;
- It is recognized that a diverse workforce increases creativity and improves the bottom line; employees with disabilities are an essential part of a diverse workforce; and,
- The corporate image is important and a company that retains employees who have or acquire disabilities will increase its value in the community thus increasing their share of new markets.
- 4. If disabled individuals are anxious to keep working, why haven't they taken more advantage of the Ticket to Work program?

While our members are not experts on the Social Security programs (including the Ticket to Work program) they strongly believe that the foundation of any changes in our current system needs to be rooted in moving our nation's view of people with disabilities from a deficit or **medical** model to a talent or **social** model.

The medical model of disability is still prevalent in our country as evidenced by our language choices, media portrayals, fundraising activities, and program eligibility requirements. A social model defines disability as different from the average, neutral in the absence of additional context, and located in the interaction between individuals and society. The remedy in the social model is ensuring that the environment is accessible and that attitudinal barriers are addressed. The social model enables society to make a paradigm shift from "hiring people with disabilities is a charitable act" to "recruiting, hiring and retaining people with disabilities is a smart business strategy.

Finally, there appear to be a maze of work incentives programs like the Ticket to Work program that exist not only within the Social Security Administration but also in other federal benefit programs. These programs seem to be complex and difficult to navigate. The complexity of the system leads to scenarios where job applicants and their advocates when applying for employment or offered a raise frequently refuse both because they are concerned about exceeding earning levels and thus jeopardizing their Social Security benefits.

5. What are employers' experiences with respect to assistive devices or workplace accommodations?

Assistive devices and accommodations are great for helping to level the playing field for persons with disabilities; however they also help with making ALL employees more productive and better engaged, thus increasing morale and loyalty.

For example, when companies implement closed captioning for webcasts it does benefit those with hearing impairments, but by far the larger populations that access this accommodation are:

- Employees with auditory processing conditions
- People who sit in open cubes and do not want to disturb their colleagues; and,
- Employees traveling in open public places like airports that need to protect confidential company information.

Many accommodations are simply viewed as productivity aids such as a larger monitor. The challenge is when the employee/applicant does not know to ask and/or does not know what is needed. Employers sometimes fear that if they bring in a disability expert they may inadvertently be exposed to a lawsuit.

6. If Congress were to authorize a pilot activity to get better data as part of disability reform what would employers want to be the design elements that the pilot or pilots should be testing?

Pilot design elements cited by USBLN® member companies included:

- Include an evaluation component to measure that job candidates with disabilities in the pilot possess the skills, interest and ability to learn the job tasks prior to actual placement.
- Usage of just in time training, and its impact on hiring managers;
- Utilize a social model of disability for program eligibility requirements that defines disability as different from the average, neutral in the absence of additional context, and located in the interaction between individuals and society;
- Setting hiring objectives;
- Self-identification, "coming out" strategies;
- Targeted development programs for employees with disabilities;

- Leveraging the USBLN® to generate innovative, replicable and sustainable ideas from our membership, and;
- Adding certified disability owned entrepreneurs to supplier spend tracked and rewarded by government.